3 PROJECT MANAGEMENT STRATEGY

Characterization of environmental conditions in the soils, groundwater, surface water, and sediments is required for the Creek and the ravine before redevelopment begins in the Park. The RI/FS must examine current and future risks to workers, the general public, and the environment. A brief description of each of the proposed tasks under this work plan, followed by the proposed project schedule to complete these tasks, is provided below.

3.1 RI/FS TASKS

The following task and subtask descriptions are planned for the Park RI/FS. These tasks will be completed as required by the *Agreed Order* and SOW negotiated between the City and Ecology on March 22, 2005 (Attachment A) and the *Cooperative Agreement* with the EPA Brownfields Program dated September 16, 2003 (Attachment B).[2]

3.1.1 Task 1 – Project Planning and Management

Activities under this task include administration and management of the project, including establishment and maintenance of necessary files and records required under the *Agreed Order* with Ecology and the *Cooperative Agreement* with EPA; performance of administration functions; support of activities necessary to perform the project in accordance with this work plan and all required statutes, circulars, terms & conditions; and attendance at necessary project meetings. City staff will submit bi-monthly and final reports, manage the consultant contract, and coordinate with cooperative partners (Ecology and EPA), stakeholders, the public, and with other City departments. City staff will also provide outreach to area stakeholders in coordination with Ecology as outlined in the Public Participation Plan (Exhibit C to the *Agreed Order*). As per the *Agreed Order*, Ecology maintains the responsibility for public participation at the site.

The project management approach will ensure timely submission of high-quality documents by adhering to the schedule discussed in Section 3.3 and by using rigorous document quality control procedures. Regular contacts within the project team will ensure that the schedule is maintained and that, if unforeseen conditions necessitate changes to the schedule, the project team is apprised so it can respond accordingly. The draft Work Plans and RI/FS document will undergo internal quality control review by the consultant as well as public and stakeholder review. Responses to public and stakeholder comments will be provided in a responsiveness summary to be included in a stand-alone

[2] This revised Work Plan meets the requirements of both the *Agreed Order* with Ecology and the *Cooperative Agreement* with EPA Brownfields program (City of Bellingham 2004). Task numbers and titles have been unified for consistency purposes.

document. A responsiveness summary is a summary of oral and/or written public comments received by Ecology during a comment period on key documents, and Ecology's responses to those comments (refer to the PPP in Attachment A for details).

The following two key subtasks will be completed as part of this task:

Subtask 1a – Project Management. The Integral project manager will support the City project manager in completing project progress reports and other administrative functions required under the *Agreed Order* and the *Cooperative Agreement* during Integral's period of performance.

Subtask 1b – Public Participation. Planning documents and investigation reports will be made available to the public for review and comment. The draft *Agreed Order* and public participation plan were made available for public review and comment in January/February 2005. Two public information meetings are scheduled during the RI/FS (refer to Section 3.3). The first public information meeting will be held to present the draft final Work Plans for the site, including the Work Plan, SAP, QAPP, and HASP. A draft RI/FS will be presented at the second public information meeting. The draft documents will be made available for review prior to and after the meetings. The meetings will be conducted in a manner to encourage substantive discussion and meaningful public input. Verbal and written comments on the documents will be accepted from the public, and responses will be incorporated into a responsiveness summary. In the event that significant changes are made to either document as a result of the public comments, the draft document could be reissued for another round of review and comments prior to finalization.

3.1.2 Task 2 – Work Plan

This document fulfills the requirements of Task 2, including an overall description and schedule of RI/FS activities, a description of project management strategy, and explanation of responsibility and authority of organizations and key personnel (see requirements of the *Agreed Order* in Attachment A).

3.1.3 Task 3 – Sampling and Analysis Plan (SAP)

The SAP provides specific guidance for field methodology and quality assurance procedures. A QAPP and HASP will also be submitted as companion documents to the SAP. Details of these plans are provided below.

The SAP has been prepared in accordance with WAC 173-340-820, WAC 173-204-600, and the Sediment Sampling and Analysis Appendix, as updated (Ecology 2003). The purpose of the SAP is to provide an overview of the RI sampling program that will obtain information needed to meet the data needs for the RI. The SAP describes the sampling

objectives and the rationale for the sampling approach. A detailed description of sampling tasks is provided, including specifications for sample identifiers; the type, number, and location of samples to be collected; the analyses to be performed; descriptions of sampling equipment and collection methods to be used; description of sample documentation; sample containers, collection, preservation and handling. The SAP also describes sample custody and handling procedures, decontamination procedures, and the handling of investigative-derived wastes. Sampling methodology and QA requirements have been developed in accordance with Ecology guidance and the requirements of the Puget Sound Estuary Program (PSEP 1986, 1997a, b, c).

The QAPP identifies and describes laboratory methods and the QA/QC measures that will be implemented during the performance of all sampling and analysis tasks to ensure the fulfillment of project DQOs. Laboratory methodology and QA/QC requirements have been developed in accordance with Ecology and EPA guidance, and the requirements of the Ecology Laboratory Accreditation Program and PSEP (1986, 1997a, b, c).

A HASP has been prepared in accordance with WAC 173-340-810. The HASP is consistent with the requirements of WISHA of 1973, RCW 49.17. The HASP identifies specific monitoring and management responsibilities and activities to ensure the protection of human health activities associated with the RI.[3]

3.1.4 Task 4 – Remedial Investigation

The City will conduct an RI to delineate the area requiring cleanup and to identify sources that may need to be eliminated or reduced as part of the cleanup. Key components of the RI are as follows:

- Determination of nature and extent of contamination exceeding MTCA and the SMS standards
- Assessment of potential human health and ecological health concerns
- Characterization of natural resources
- Evaluation of source control and recontamination.

Three key subtasks will be completed under this task:

Subtask 4a – Field Work. This subtask encompasses all the labor, equipment, and supplies to complete all field work in support of the RI. Field work will include sampling groundwater, soil, and surface water and sediments in the Creek. A detailed description

[3] The HASP is not subject to Ecology or EPA approval.

of the field tasks is presented in the project SAP. Workers in the field will follow health and safety procedures documented in the project HASP.

Subtask 4b – Testing. This subtask includes chemical, biological, and physical testing of samples collected in support of the RI. A detailed description of laboratory methodology and QA/QC procedures is presented in the project QAPP.

Subtask 4c – RI Report. The RI report is outlined in Section 3.2.

3.1.5 Task 5 – Feasibility Study

The City will use the information obtained in the RI to conduct an FS. The FS will include the following components:

- Determination of cleanup standards and applicable laws
- Identification and screening of cleanup technologies
- Basis for assembly of cleanup action alternatives
- Description of cleanup alternatives
- Comparative evaluation of cleanup alternatives.

3.2 RI/FS REPORT OUTLINE

A draft RI document will be completed (refer to project schedule in Section 3.3). After an initial review by Ecology and EPA, the RI will be combined with the draft FS into a draft final RI/FS document for stakeholder and public review before the completion of the final RI/FS. A draft outline for the RI/FS document is presented below (from Ecology 2003, 1991).

Section 1.0 **Site Description** (includes operational and regulatory history, contaminants of concern, location, and detailed site maps)

Section 2.0 **Physical Characteristics** (hydrology and geology of surface water, groundwater, sediment, and upland areas associated with the site, including hydrogeologic cross-sections and water table contour maps)

Section 3.0 **Chemical and Biological Characteristics** (an evaluation and analysis of all contaminant data from previous studies and the RI, including sampling and testing methods, concentration contour maps [vertical and horizontal], biological effects data, discussion of historical and ongoing sources, potential for contaminant migration, potential for natural recovery, and other pertinent data for environmental media at the site)

Section 4.0 **Conceptual Site Model** (includes sources, transport pathways, potential receptors, and exposure pathways)
Section 5.0 **Development of Proposed Cleanup Standards** (cleanup levels [including ARARs and background levels], Indicator Hazardous Substances, points of compliance for each medium)
Section 6.0 **Recommended Remedial Action Objectives**
Section 7.0 **Development and Screening of Cleanup Alternatives** (description of technologies that were reviewed as part of the development of cleanup action alternatives)
Section 8.0 **Identification of Preferred Cleanup Action Option(s)**
Section 9.0 **References**
Appendix A **Field Logs and Information** (includes all sampling logs, photographic record, etc.)
Appendix B **Chemical, Biological and Physical Testing Results** (includes QA/QC data reviews, discussion and recommendations)
Appendix C **Data Screening Backup**
Appendix D **Screening of Technology Data**

In addition to a written RI/FS report, all chemical, biological, and physical data will be submitted to Ecology in electronic SEDQUAL and Environmental Information Management (EIM) formats.

3.3 PROJECT SCHEDULE

The schedule for all tasks described in Section 3.1, including major milestones, is summarized in Table 3-1. The project milestones are linked to the project objectives and measures of success as described below. As previously stated, the City and Ecology entered into an *Agreed Order* on March 22, 2005, which represents the first major milestone for the project (Task 1b). A basic schedule for the project is outlined in the *Agreed Order* Exhibit B (Scope of Work) and includes the following:

RI/FS Actions	Completion Time
Draft RI/FS Work Plan, SAP, QAPP, and HASP	60 days from effective date of Agreed Order
Draft Final RI/FS, Work Plan, SAP, QAPP, and HASP	30 days from receipt of Ecology comments on Draft RI/FS Work Plan, SAP, and QAPP
Public Review of Draft Final Work Plan, SAP, QAPP, and HASP	30 days minimum
Final Work Plan, SAP, QAPP, and HASP	30 days from the close of public comment period
Draft RI Report	210 days from Ecology approval of Final Work Plan, SAP, and QAPP
Draft FS Report	120 days from submission of Draft RI Report

RI/FS Actions	Completion Time
Draft Final RI/FS Report	30 days from receipt of Ecology comments on the draft RI/FS
Public Review of Draft Final RI/FS Report	30 days minimum
Final RI/FS Report	60 days from the close of public comment period

The project coordinators (for both the City and Ecology) will be responsible for overseeing implementation of the *Agreed Order*, including the development of the RI/FS.

Once the *Agreed Order* was signed and a public participation plan was drafted by Ecology, a review of existing studies was initiated to identify data gaps. This information shaped the development of the project Work Plan and SAP (Tasks 2 and 3).

An interim draft Work Plan was prepared by the City in December 2004 to fulfill EPA Brownfields requirements. The draft Work Plan had a limited scope in that it dealt only with portions of the Park not owned by the City. In addition, as the *Agreed Order* had not yet been signed, the draft document did not receive full review and final approval by Ecology.

Once the *Agreed Order* was finalized, the City drafted revised Work Plans in April 2005 (expanding on the pre-existing 2004 EPA Brownfields document). As specified in the *Agreed Order*, they were submitted to Ecology for review and comment. The completion of the draft final Work Plans after incorporation of EPA and Ecology comments represents the second major milestone for the project. The draft final Work Plans (this document) will be available for review by the public during a public information meeting tentatively scheduled for August 2005. Agency approval of the final Work Plans represents the third major milestone for the project.

The RI/FS report (Tasks 4 and 5) will be produced following completion of the sampling and testing outlined in the SAP, including the receipt and review of the analytical results. The RI/FS report will include the critical environmental evaluation (including evaluation of cleanup levels) for project decision-making and selection of a preferred cleanup action for the site. The draft final RI/FS report represents the fourth major milestone in the project. Upon completion of the draft final RI/FS, there will be a public comment period and information meeting coordinated with EPA and Ecology to present the results of the RI/FS of the Park. Verbal and written comments on the documents will be accepted by the public and responses will be incorporated into the final RI/FS. The final RI/FS represents the fifth major milestone in the project. The final RI/FS is tentatively scheduled for completion in October 2006.

Table 3-1. Estimated Project Schedule.

RI/FS Task	Estimated Completion Date	Milestone
Agreed Order Signed	March 22, 2005	◆
Issue Revised Draft Work Plans	Spring 2005	
Issue Draft Final Work Plans	Summer 2005	◆
Public Comments and Information Meeting	Summer 2005	
Issue Final Work Plans	Fall 2005	
Agency Approval of Final Work Plans	Fall 2005	◆
Sampling and Testing	Winter/Spring 2006	
Draft RI Report	Spring 2006	
Draft FS Report	Summer 2006	
Draft Final RI/FS Report	Fall 2006	◆
Public Comments and Information Meeting	Fall 2006	
Final RI/FS Report	Fall/Winter 2006	◆